

Ms. Luly Massaro, Clerk
Rhode Island Public Utilities Commission
89 Jefferson Blvd.
Warwick, RI 02888

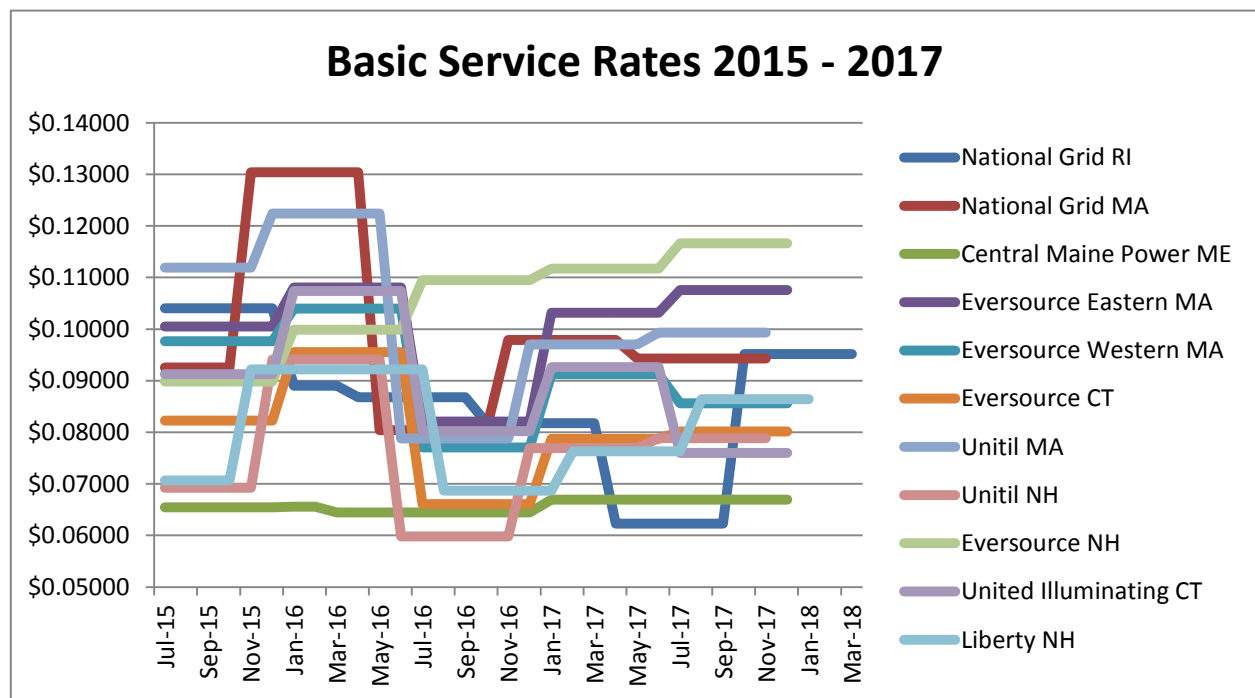
August 22, 2017

Re: Public Comments on Proposed Rate Increase

Dear Ms Massaro,

This is Kat Burnham writing to you on behalf of People's Power & Light (PP&L), a Rhode Island non-profit that advocates on behalf of consumers and the environment. Regarding the proposed rate increase, we have the following comments.

We trust the Commission to thoroughly review the details behind National Grid's proposed procurement according to best practices. We have a graph here comparing National Grid's prices relative to other New England utilities. Rhode Island is indeed coming off a recent period of relatively low prices compared to other New England states.



That said, we would like to emphasize that we expect the new rates to be affordable and to promote adequate reliability. People's Power & Light strongly rejects the implication that consumers would be better off if there was more natural gas capacity. The costs for additional gas capacity far outweigh the supposed savings on electric rates.

According to a report by the Analysis Group, “The power system reliability can and will be maintained over time, with or without additional new interstate natural gas pipeline capacity”.¹ Likewise, another recent report by the experts at Synapse Energy Economics states, “The overall need for natural gas in New England’s electric sector is expected to decline dramatically”.² These reports provide a thorough analysis of New England’s electricity mix with particular attention to the cost and implications of additional natural gas compared to other alternatives.

We need to honor our commitments to reduce emissions and protect our state from the impacts of climate change. Natural gas is not a clean burning source as other stakeholders have suggested in their public comments. The methane emitted and emissions from the inevitable leaks exacerbate the rise of temperatures and put Rhode Islanders at risk. Shifting away from gas also avoids incurring high costs of infrastructure and adaption costs later on. We need to diversify our options.

PP&L supports other ways to move the market away from over-dependence on natural gas. Energy efficiency consistently costs less than any supply, for example. We are deeply disappointed by the recent \$12.5 million raid of energy efficiency funds by the Rhode Island State Legislature for the general fund. That scoop was counterproductive in terms of keeping long-term rates and bills down. Going forward, PP&L would like to see more efficiency, more demand response, more renewable sources, and dynamic pricing. These options are also local, keeping dollars from leaving our state’s economy and providing more jobs in a growing industry. That is good policy for residents, businesses, and the environment.

Fortunately, we are seeing those resources come into the market. Rhode Island planners need to prioritize solutions that transition us from polluting, volatily priced fossil fuels to a clean energy future that benefits everyone.

Thank you for the opportunity to provide public comment.

Sincerely,



Kat Burnham

Energy Programs Manager

¹ Power System Reliability in New England: Meeting Electric Resource Needs in an Era of Growing Dependence on Natural Gas. <http://www.mass.gov/ago/docs/energy-utilities/eros-study-final.pdf>

² New England’s Shrinking Need for Natural Gas: An analysis of policy impacts on natural gas use in New England’s electric sector. <http://www.synapse-energy.com/sites/default/files/New-Englands-Shrinking-Need-for-Natural-Gas-16-109.pdf>